

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

XINLU FAN, LIANG'E FAN,  
SHAOCHUN FU, JIANHUA GU,  
FENYING LI, MINGXIA LI, YONGNIAN  
SHI, CHENLIN WANG, SHUWEN WU,  
HAIJUN ZHOU, and XIAOFANG ZHOU,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION;  
QUARTZBURG GOLD, LP; ISR  
CAPITAL, LLC; IDAHO STATE  
REGIONAL CENTER, LLC; and SIMA  
MUROFF,

Defendants.

U.S. BANK NATIONAL ASSOCIATION,

Crossclaimant,

v.

QUARTZBURG GOLD, LP; and IDAHO  
STATE REGIONAL CENTER, LLC,

Crossclaim  
Defendants.

NO. 2:19-cv-01545-RSM

**STIPULATION AND ORDER  
REGARDING CLASS  
CERTIFICATION DEADLINES**

STIPULATION AND ORDER RE:  
CLASS CERTIFICATION DEADLINES  
2:19-cv-01545-RSM

**DORSEY & WHITNEY LLP**  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8800  
FAX: (206) 903-8820

1 Plaintiffs and Defendants identified below, who are all parties who have appeared in this  
2 action, by and through their undersigned counsel, hereby stipulate and agree that the deadline for  
3 the Motion to Certify Class, currently scheduled for July 17, 2020, should be continued until  
4 August 14, 2020; that the deadline for any Opposition to Motion to Certify Class, currently  
5 scheduled for August 14, 2020, should be continued until September 11, 2020; and that the  
6 deadline for any Reply in Support of Motion to Certify Class, currently scheduled for September  
7 11, 2020, should be continued until October 9, 2020. These stipulated and agreed deadlines would  
8 amend the existing deadlines ordered by this Court pursuant to the parties' prior Stipulation and  
9 Order Regarding Class Deadlines (Dkt. #42) ("First Stipulation").

10 As previously explained in the parties' First Stipulation, Defendant U.S. Bank National  
11 Association has noticed the deposition of the putative class representative and has agreed to take  
12 the deposition remotely, over videoconference. However, Plaintiffs' counsel has represented that  
13 the putative class representative cannot be deposed in China, even remotely, because depositions  
14 in China are illegal, and has further represented that the putative class representative is currently  
15 prohibited from traveling to another location for the deposition at this time due to travel and other  
16 restrictions resulting from the global COVID-19 pandemic. Plaintiffs' counsel has represented  
17 that the restrictions that were in place as of the filing of the parties' First Stipulation remain in  
18 place as of this filing. The parties agree that there is good cause for this request because U.S. Bank  
19 believes it is entitled to take the deposition of the putative class representative before class  
20 certification is briefed but the putative class representative remains unavailable to be deposed at  
21 this time. This Stipulation is without waiver of any party's right to seek further extensions or other  
22 relief.

23 For these reasons, the parties hereto stipulate and agree to, and respectfully and jointly  
24 request entry of, the Order set forth below.

Respectfully submitted this 10th day of July, 2020.

/s/ Shawn Larsen-Bright

Jeremy Larson, WSBA #22125  
Shawn Larsen-Bright, WSBA #37066  
701 Fifth Avenue, Suite 6100  
Seattle, WA 98104-7043  
(206) 903-8800  
larson.jake@dorsey.com  
larsen.bright.shawn@dorsey.com

***Attorneys for U.S. Bank National  
Association***

/s/ Jihee Ahn

John F. Rapp, WSBA #17286  
Daniel P. Harris, WSBA #16778  
Jihee Ahn, WSBA #16778  
John McDonald *admitted pro hac vice*  
Harris Bricken  
600 Stewart Street, Suite 1200  
Seattle, WA 98101  
Tel: 206-224-5657  
Fax: 206-224-5659  
john.rapp@harrisbricken.com  
dan@harrisbricken.com  
jihee@harrisbricken.com  
john.mcdonald@harrisbricken.com

***Attorneys for Plaintiffs Xinlu Fan, et al.***

/s/ Sean Prosser

Sean T. Prosser, *admitted pro hac vice*  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo  
3580 Carmel Mountain Road, Suite 300  
San Diego, CA 92130  
STProsser@mintz.com

Roger D. Mellem, WSBA #14917  
Adam Doupe, WSBA #55483  
Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, Washington 98101-3034  
mellem@ryanlaw.com  
doupe@ryanlaw.com

***Attorneys for Defendants Quartzburg Gold,  
LP, ISR Capital LLC and Idaho State  
Regional Center, LLC***

**ORDER**

Based upon the foregoing Stipulation, and for good cause shown, it is hereby ORDERED that the deadline for any Motion to Certify Class is hereby continued to August 14, 2020; that the deadline for any Opposition to Motion to Certify Class is hereby continued to September 11, 2020; and that the deadline for any Reply in Support of Motion to Certify Class is hereby continued to October 9, 2020.

IT IS SO ORDERED this 14<sup>th</sup> day of July, 2020.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

John F. Rapp, WSBA #17286  
Daniel P. Harris, WSBA #16778  
Jihee Ahn, WSBA #16778  
John McDonald *admitted pro hac vice*  
Harris Bricken  
600 Stewart Street, Suite 1200  
Seattle, WA 98101  
Tel: 206-224-5657  
Fax: 206-224-5659  
john.rapp@harrisbricken.com  
dan@harrisbricken.com  
jihee@harrisbricken.com  
john.mcdonald@harrisbricken.com

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

***Attorneys for Plaintiffs Xinlu Fan, et al***

Roger D. Mellem, WSBA #14917  
Adam Doupe, WSBA #55483  
Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, Washington 98101-3034  
mellem@ryanlaw.com  
doupe@ryanlaw.com  
*and*

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

Sean T. Prosser, *admitted pro hac vice*  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo  
3580 Carmel Mountain Road, Suite 300  
San Diego, CA 92130  
STProsser@mintz.com

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

***Attorneys for Defendants Quartzburg Gold,  
LP, ISR Capital LLC and Idaho State  
Regional Center, LLC***

DATED this 10th day of July, 2020.

/s/ Molly Price

Molly Price, Legal Assistant